

INTEGRATED HEALTH SERVICES OF
CLIFF MANOR, INC., INTEGRATED
HEALTH SERVICES AT RIVERBEND,
INTEGRATED HEALTH SERVICES AT
SOMERSET VALLEY, INC., ALPINE
MANOR, INC., BRIARCLIFF NURSING
HOME, INC., SPRING CREEK OF IHS, INC.,
FIRELANDS OF IHS, INC., ELM CREEK OF
IHS, INC., and IHS LONG TERM CARE
SERVICES, INC.,

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant,

v.

ABE BRIARWOOD CORPORATION and
JOHN DOES 1-10,

Additional Counterclaim
Defendants,

Civil Action No. 04-910

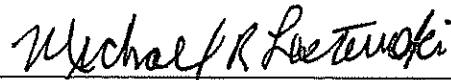
PLAINTIFFS' MOTION TO REMAND

Plaintiffs IHS Long Term Care Services, Inc. and the other plaintiffs, as well as additional counterclaim defendant Abe Briarwood Corporation (collectively, the “Movants”), hereby move this Court, pursuant to 28 U.S.C. §§ 1452(b), 1447(c) and 1367(c)(3), for an order remanding this case to the Circuit Court of the County of Platte, State of Missouri. In support of

this Motion, the Movants submit and rely on Plaintiffs' Memorandum of Law in Support of Motion to Remand and the Declaration of Richard W. Riley in Support of Motion to Remand, which have been filed contemporaneously with this Motion.

DATED: March 30, 2006

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Counterclaim Defendant Abe Briarwood Corp.*